



MICHAEL P. LOWRY, ESQ.
Nevada Bar No. 10666
E-mail: Michael.Lowry@wilsonelser.com
AMANDA A. EBERT, ESQ.
Nevada Bar No. 12731
E-mail: Amanda.Ebert@wilsonelser.com
300 South 4th Street, 11th Floor
Las Vegas, NV 89101-6014
Tel: 702.727.1400/Fax: 702.727.1401
Attorneys for Keolis Transit Services, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Ashley Cook, individually,

Plaintiff,

vs.

Harold Thomas, individually; Keolis Transit America, Inc. d/b/a Keolis Transportation d/b/a Regional Transportation Commission of Southern Nevada d/b/a RTC of Southern Nevada d/b/a RTC; Keolis Transit Services, LLC d/b/a Keolis Transportation d/b/a Regional Transportation Commission of Southern Nevada d/b/a RTC of Southern Nevada d/b/a RTC; and Does 1 to 100, Roe Corporation 1 to 100, inclusive,

Defendants.

Case No.: 2:19-cv-889

**Keolis Transit Services, LLC's
Removal Petition**

Keolis Transit Services, LLC petitions to remove this case to the United States District Court for the District of Nevada from the Eighth Judicial District Court for the State of Nevada. This petition for removal is signed per Rule 11.

Removal is appropriate per 28 U.S.C. § 1441 because diversity jurisdiction is present per 28 U.S.C. 1332. Plaintiff alleges she is a resident of Nevada.¹ Keolis Transit Services, LLC is a wholly owned subsidiary of Keolis Transit America, Inc., a Delaware corporation with its principal place of business in California. Plaintiff alleges injury from a motor vehicle collision

¹ ECF No. 1-2 at ¶ 1.

1 that occurred on May 12, 2017.² She filed her complaint on April 29, 2019.³ Before suit was
2 filed, she asserted past medical damages of \$106,960.42 and that she will require future medical
3 care at a cost of \$385,600.00.⁴

4 DATED this 28th day of May, 2019.



6
7
8 BY: /s/ Michael P. Lowry

MICHAEL P. LOWRY, ESQ.

Nevada Bar No. 10666

9 AMANDA A. EBERT, ESQ.

Nevada Bar No. 12731

10 300 South 4th Street, 11th Floor

11 Las Vegas, NV 89101-6014

Tel: 702.727.1400/Fax: 702.727.1401

12 Attorneys for Keolis Transit Services, LLC
13
14
15
16
17
18
19
20
21
22
23
24
25
26

27 ² *Id.* at ¶ 12.

28 ³ ECF No. 1-2.

⁴ ECF No. 1-3.

Certificate of Service

Pursuant to NRCP 5, I certify that I am an employee of Wilson Elser Moskowitz Edelman & Dicker LLP, and that on May 28, 2019, I served **Keolis Transit Services, LLC's Removal**

Petition as follows:

- ☐ by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;
- ☒ via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk;

Elizabeth E. Coleman Naqvi Injury Law 9500 W Flamingo Rd Ste 104 Las Vegas, NV 89147 Tel: (702) 553-1000/Fax: (702) 553-1002 Attorneys for Ashley Cook	
---	--

BY: /s/ Michael P. Lowry

An Employee of

